

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: Case # 18-22548-GLT
Todd M. Smith, Chapter 13
Debtor.

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that, pursuant to Rule 9010 of the Bankruptcy Rules, **BOROUGH OF AVALON**, is a creditor and hereby appears in this case.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 2002 of the Bankruptcy Rules, the undersigned requests that all notices and papers specified by that Rule, and all other notices given or required to be given in this case and all other papers served or required to be served in this case, be given to and served upon:

**Jeffrey R. Hunt, Esquire
GOEHRING, RUTTER & BOEHM
437 Grant Street, 14th Floor
Pittsburgh, PA 15219-6107
TEL: (412)281-0587
FAX: (412)281-6570**

The foregoing request includes without limitation, notices of any orders, pleadings, motions, applications, complaints, demands, hearings, requests or petitions, disclosure statements, answering or reply papers, memoranda and briefs in support of any of the foregoing and any other document brought before this Court with respect to these proceedings, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery telephone, telegraph, telex or otherwise that (1) affects or seeks to affect in any way any rights or interest of any creditor or party in interest in the case, with respect to the (a) debtor, (b) property of the debtor's estate, or proceeds thereof, in which the debtor may claim an interest, or (c) property or proceeds thereof in the possession, custody, or control of others that the debtor may seek to use; or (2) requires or seeks to require any act, delivery of any property, payment or other conduct.

PLEASE TAKE FURTHER NOTICE that the **BOROUGH OF AVALON** intends that neither this Notice of Appearance nor any later appearance, pleading, claim or suit shall waive (1) its right to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; or (2) any other rights, claims, actions, defenses, setoffs, or recoupments to which it may be entitled under any agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses setoff, and recoupments are expressly reserved.

Dated: December 20, 2018

GOEHRING, RUTTER & BOEHM

By: /s/ Jeffrey R. Hunt
Jeffrey R. Hunt, Esquire
Pa. I.D. #90342
Frick Building, 14th Floor
437 Grant Street
Pittsburgh, PA 15219
(412) 281-0587
Attorney for Movant
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DECLARATION IN LIEU OF AFFIDAVIT

I certify that this request supersedes any prior request for Notice by this creditor, that there is no other request to receive Notices for the specified creditor, and that I am authorized to make this request for Notices on behalf of the named creditor.

GOEHRING, RUTTER & BOEHM

By: /s/ Jeffrey R. Hunt
Jeffrey R. Hunt, Esquire
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Frick Building, 14th Floor
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**CERTIFICATE OF MAILING OF NOTICE OR OTHER DOCUMENT TO
PARTIES IN INTEREST**

**Kenneth Steidl
Steidl & Steinberg
Suite 2830 Gulf Tower
707 Grant Street
Pittsburgh, PA 15219**

**Ronda J. Winnecour, Esquire
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219**

**Office of the United States Trustee
Liberty Center
1001 Liberty Avenue, Suite 970
Pittsburgh, PA 15222**

GOEHRING, RUTTER & BOEHM

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